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UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ILLINOIS - EASTERN DIVISION

DONALD BRADY,

Plaintiff,

v.

BUSCO, INC., a foreign corporation,
d/b/a ARROW STAGE LINES,

Defendant.

No. 07 CV 6943

Judge Joan B. Gottschall
Magistrate Judge Martin C. Ashman

FEB 07 2008
FILED
FEB 07 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT


**RESPONSE TO DEFENDANT'S MOTION TO DISMISS FOR LACK OF
JURISDICTION OVER THE DEFENDANT, AND ALTERNATE MOTION TO
TRANSFER VENUE**

Now comes the Plaintiff, Donald Brady, by his attorney, Joseph M. McGovern,
and for his response to the defendant's motion to dismiss or in the alternative to transfer
venue, states as follows:

1. That the plaintiff hereby stipulates that he will not seek a judgment in
excess of \$75,000, exclusive of interest and costs in this matter.
2. In order for diversity jurisdiction to exist under 28 USC Section 1332, that
matter in controversy must exceed the sum or value of \$75,000, exclusive
or interests and costs.
3. 28 USC Section 1447(c) provides that if any time before final judgment it
appears that the district court lacks subject matter jurisdiction, the case
shall be remanded.

Wherefore, Plaintiff prays the court remand this matter to the Circuit Court of
Cook County.

Respectfully submitted,

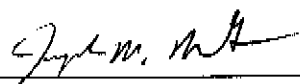


Attorney for Plaintiff

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ARDC #

CERTIFICATE OF SERVICE

Joseph M. McGovern, the attorney for the Plaintiff, certifies that on the 7th day of February, 2008, he served a copy of the foregoing Response to Motion to Dismiss by mailing a copy to Jonathan P. Schaefer, Purcell & Wardrop Chtd., 10 South LaSalle Street, Suite 1200, Chicago, Illinois 60603 by depositing same in the U.S. Mail at Evergreen Park, Illinois, with the proper postage prepaid.



Joseph M. McGovern